

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

HANAN ELATR KHASHOGGI,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:23-cv-00779-LMB-LRV
)	
NSO GROUP TECHNOLOGIES)	
LIMITED, et al.,)	
)	
Defendants.)	
_____)	

[PROPOSED] LIMITED PROTECTIVE ORDER

Having reviewed Defendants’ Unopposed Motion for Entry of a Limited Protective Order, the Court orders Plaintiff’s counsel not to publish or share with anyone other than counsel of record in this matter the materials in support of a response to the pleadings designated by Defendants as “Highly Confidential Attorney’s Eyes Only,” (the “AEO Materials”), except as agreed to in writing by Defendants, until such time as the Court enters a confidentiality protective order, at which point the terms of that confidentiality protective order shall govern the treatment of the AEO Materials. If no such confidentiality protective order is entered, Plaintiff’s counsel shall return or destroy all copies of the AEO Materials within 60 days of the final disposition of this litigation, with final disposition deemed to be the later of (1) dismissal of all claims and defenses in this action, with or without prejudice; and (2) final judgment herein after the completion and exhaustion of all appeals, rehearings, remands, trials, or reviews of this action, including the time limits for filing any motions or applications for extension of time pursuant to applicable law.

It is SO ORDERED.

Date: _____

UNITED STATES DISTRICT JUDGE

WE ASK FOR THIS:

/s/ Edmund Paul Power
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